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11 *Attorneys for Defendants*

12 UNITED STATES DISTRICT COURT

13 DISTRICT OF NEVADA

14 DARREN HEYMAN,

15 Plaintiff,

16 vs.

17 THE STATE OF NEVADA EX
18 REL. BOARD OF REGENTS OF THE
19 NEVADA SYSTEM OF HIGHER
20 EDUCATION ON BEHALF OF THE
21 UNIVERSITY OF NEVADA, LAS VEGAS;
22 NEAL SMATRESK; DONALD SNYDER;
23 STOWE SHOEMAKER; RHONDA
24 MONTGOMERY; CURTIS LOVE; SARAH
25 TANFORD; PHILLIP BURNS; KRISTIN
26 MALEK; LISA MOLL-CAIN; DEBRA
27 PIERUSCHKA; ELSA SIDHU AND DOES
28 I – X INCLUSIVE,

Defendants.

Case No. 2:15-cv-01228-RFB-GWF

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR
DEFENDANTS TO FILE RESPONSIVE
PLEADINGS TO PLAINTIFF'S FIRST
AMENDED COMPLAINT**

21 Defendants The State Of Nevada Ex Rel. Board Of Regents Of The Nevada System Of
22 Higher Education On Behalf Of The University Of Nevada, Las Vegas ("UNLV"), Neal
23 Smatresk, Donald Snyder, Stowe Shoemaker, Rhonda Montgomery, Curtis Love, Sarah Tanford,
24 Phillip Burns, Kristin Malek, Lisa Moll-Cain, Debra Pieruschka, and Elsa Sidhu ("Defendants"),
25 by and through counsel of record, Jackson Lewis P.C., and Plaintiff Darren Heyman ("Plaintiff"),
26 hereby stipulate and agree to extend the time for Defendants to file responsive pleadings to
27 Plaintiff's First Amended Complaint for sixteen (16) days, from April 27, 2016, up to and
28 including May 13, 2016.

1 The parties collectively request this extension for the following reasons:

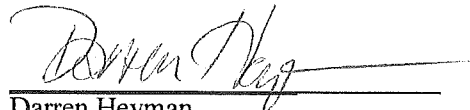
- 2 • Plaintiff Darren Heyman ("Plaintiff") filed his First Amended Complaint
3 ("Complaint"), Document No. 28, on April 13, 2016.
- 4 • Plaintiff's Complaint spans 119 pages, and includes 31 claims and 12 named
5 defendants. The prior draft complaint attached to Plaintiff's Motion for Leave to
6 Amend (Dkt. 20) spanned 78 pages, and included 16 claims and 10 named defendants.
7 Thus, Plaintiff's Complaint contains approximately 41 pages of additional allegations
8 and claims against Defendants that will require time to evaluate in order to prepare
9 responsive pleadings.
- 10 • Plaintiff's Complaint added new claims against Defendant UNLV, UNLV's General
11 Counsel, Elda Sidhu, in her official capacity, and Assistant General Counsel, Debra
12 Pieruschka, in both her official and individual capacity; and additional claims against
13 Defendants Neal Smatresk, Donald Snyder, Stowe Shoemaker, Rhonda Montgomery,
14 Curtis Love, Sarah Tanford, Phillip Burns, Kristin Malek, and Lisa Moll-Cain.
- 15 • Prior to Plaintiff's filing of the Complaint, newly named Defendants Sidhu and
16 Pieruschka were representing all of the Defendants in the case. As Defendants Sidhu
17 and Pieruschka have been named in the Complaint, Sidhu and Pieruschka can no
18 longer continue representing the Defendants in this case.
- 19 • Accordingly, Defendant UNLV just recently retained Jackson Lewis P.C., on April 22,
20 2016, to represent and defend UNLV and the other Defendants named in Plaintiff's
21 Complaint in this case.
- 22 • Jackson Lewis P.C. will file concurrently with this Stipulation a Substitution of
23 Counsel for UNLV. Additionally, Jackson Lewis P.C. will subsequently file
24 Substitutions of Counsel for the other named Defendants.
- 25 • Jackson Lewis P.C. will accept service of the Complaint on behalf of Defendants
26 Debra Pieruschka and Elda Sidhu.
- 27 • Jackson Lewis P.C. also will file responsive pleadings for Defendants Debra
28 Pieruschka and Elda Sidhu on or before May 13, 2016.

- The Parties will hold their Federal Rule of Civil Procedure 26(f) Conference within one week after the responsive pleadings have been filed on behalf of all Defendants.
- This is the first request for an extension of time for Defendants to file responsive pleadings to Plaintiff's Complaint.

This stipulation and order is sought in good faith and not for the purpose of delay. No prior request for any extension of time has been made with respect to Plaintiff's Complaint.

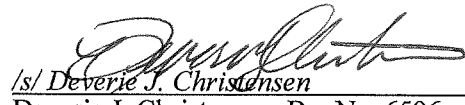
Dated this 25 day of April, 2016.

DARREN HEYMAN



Darren Heyman
830 Carnegie St. #1324
Henderson, Nevada 89052
Plaintiff In Proper Person

JACKSON LEWIS P.C.


/s/ Deverie J. Christensen

Deverie J. Christensen, Bar No. 6596
3800 Howard Hughes Parkway, Suite 600
Las Vegas, Nevada 89169
Attorneys for Defendants

ORDER

IT IS SO ORDERED DATED: April 26, 2016.



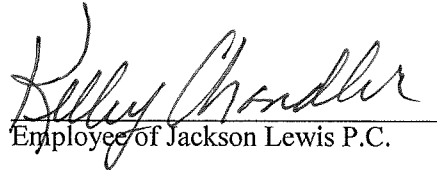
RICHARD F. BOULWARE, II
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Jackson Lewis P.C. and that on this 26th day of April, 2016, I caused to be served a true and correct copy of the above and foregoing, via the United States Mail, postage prepared, properly addressed to the following:

Darren Heyman
830 Carnegie St. #1324
Henderson, NV 89052

Plaintiff in Proper Person


Employee of Jackson Lewis P.C.

4812-6958-4689, v. 1